

D. GILBERT ATHAY (0143)
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH CENTRAL DIVISION

UNITED STATES OF AMERICA,	:	
Plaintiff,	:	MOTION TO MODIFY TERMS AND CONDITIONS OF RELEASE
vs.	:	
BARON LOMBARDO,	:	Case No. 2:07CR286
Defendant.	:	Judge Paul G. Cassell Magistrate Judge Paul Warner

The defendant, Baron Lombardo, through his lawyer, D. Gilbert Athay, herewith moves the court to modify the terms and conditions of his pre-trial release to permit him to travel throughout the continental United States for business purposes.

The defendant has properties in California and business dealings that require him to travel outside of Las Vegas.

The court should modify the terms and conditions of his release to permit him to travel by giving notice to pre-trial services of the dates and times that such travel is necessary.

DATED: July 5, 2007.

/s/ D. Gilbert Athay
D. Gilbert Athay
Lawyer for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on July 5, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

United States Attorney's Office
185 South State Street, Suite 400
Salt Lake City, Utah 84111

/s/ Heather M. Stokes